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CJ22 5090
Timmons

IN THE DISTRICT COURT OF OKLAHOMA COUNTY, STATE OF OKLAHOMA
OKLAHOMA DISTRICT COURT
OKLAHOMA COUNTY

Noah Brown and Carolyn Brown)

OCT 14 2022

Plaintiff,)

RICK WARREN
COURT CLERK

vs.)

38

State Farm Fire and Casualty Company)

CJ-2022-5090

Defendant.)

Case No. _____

JURY TRIAL DEMANDED

PETITION

COMES NOW Plaintiff, Noah Brown and Carolyn Brown, and for their causes of action against Defendant, State Farm Fire and Casualty Company ("State Farm"), alleges and states:

1. At all times material hereto, Plaintiff insured their home under a policy of insurance with State Farm, policy number 36-CB-B929-9.
2. Defendant State Farm is licensed and does business in the state of Oklahoma as a property and casualty insurer.
3. On or about October 15, 2021, Plaintiff's home sustained damage in a covered loss due to a hail and windstorm.
4. The acts and occurrences that are the subject of this lawsuit occurred within the state of Oklahoma and occurred within Oklahoma County, Oklahoma. Therefore, jurisdiction and venue are proper within Oklahoma County, Oklahoma.
5. State Farm breached the subject insurance policy by wrongfully denying coverage and failing and refusing to pay the proper amounts due under the policy for the covered damage to the Plaintiff's home.

6. In its handling of Plaintiff's claim, Defendant breached the insurance contract and the implied covenant of good faith and fair dealing, as a matter of standard business practice, in the following respects:

- a. failing and refusing payment and other policy benefits for the covered damage to Plaintiff's home at a time when Defendant knew that Plaintiff were entitled to those benefits;

WHEREFORE, Plaintiff prays for judgment against the Defendant, State Farm Fire and Casualty Company, compensatory damages, with interest and costs of this action, for a reasonable attorney fee and for such other relief as may be appropriate. The amount sought as damages is greater than \$10,000.

DocuSigned by:
Amanda Blackwood 10/14/2022
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 Attorney for the Plaintiff.

Approved by:

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Noah Brown 10/14/2022
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 DocuSigned by:
Carolyn Brown 10/14/2022
 30331251E519483...
 Noah Brown and Carolyn Brown



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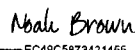
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Noah Brown
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 Security Level: Email, Account Authentication
 (None)

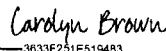
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Carolyn Brown
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 Security Level: Email, Account Authentication
 (None)

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